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UNITED STATES DISTRICT COURT **FILED**

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SOUTHERN DISTRICT OF CALIFORNIA - 3 PM 2:20

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UNITED STATES OF AMERICA

Magistrate Case No. DIVISION 12B12899  
SOUTHERN DISTRICT OF CALIFORNIA

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Plaintiff,

COMPLAINT FOR VIOLATION

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v.

Title 18, U.S.C. §1591(a) and (b)-  
Sex Trafficking of Minors

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Jamie Heriberto Santana,  
Claudia Stephanie Alvarez,  
Keke Jamar Caldwell,  
Laresha Wilson,  
Defendants.

*Unsealed on 8/16/12*  
**SEALED**

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The undersigned Complainant, being duly sworn, states:

Count 1

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On or about and between December 25, 2011 through February 16, 2012, within the Southern District of California, defendant Jamie Heriberto Santana, Claudia Stephanie Alvarez, , knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit: Juvenile Female 1 (JV1) and Juvenile Female 2 (JV2), knowing and in reckless disregard of the fact that JV1-2: (1) would be caused to engage in a commercial sex act; and (2) having had a reasonable opportunity to observe JV1-2 and knowing and in reckless disregard of the fact that JV1-2 had not attained the age of 18 years; in violation of Title 18, United States Code, Sections 1591(a) and (b).

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Count 2

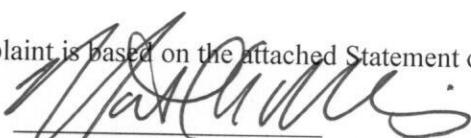
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On or about and between June 26, 2012 and July 2, 2012, within the Southern District of California, defendant Jamie Heriberto Santana and Laresha Wilson, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit, Juvenile Female 2 (JV2): (1) knowing and in reckless disregard of the fact that JV2 would be caused to engage in a commercial sex act; and (2) having had a reasonable opportunity to observe JV2 and knowing and in reckless disregard of the fact that JV2 had not attained the age of 18 years; in violation of Title 18, United States Code, Section 1591(a) and (b).

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And the complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

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Matthew M. Perkins  
Special Agent, FBI

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Sworn to me and subscribed in my presence this 3 day of August, 2012.

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Rita Horne

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UNITED STATES MAGISTRATE JUDGE

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ANXA DS  
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**STATEMENT OF FACTS**

1                   I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) assigned to the San  
 2 Diego, California, office. I am assigned to the North County Resident Agency, where among my duties I  
 3 currently am assigned to investigate Violent Crimes, including child prostitution matters.

4                   On December 25, 2011, Jaime Santana and (JV2) first met by chance at the Solana Beach  
 5 Transit Center. Santana asked her what she did to make money. (JV2) replied that since she was only 17  
 6 years old, she earned money by babysitting. He told her that if she wanted to make real money she  
 7 should work for him escorting men. She asked if he was a pimp to which he said that is a derogatory  
 term and preferred something less offensive. He encouraged her to find a friend willing to prostitute and  
 to remain in contact.

8                   On January 13, 2012, (JV2) along with a friend, (JV1) met Santana at the Carlsbad Transit  
 9 Center and traveled with him to 3454 Del Sol Blvd. Apt F, San Diego, California 92154, an apartment  
 10 where Claudia Alvarez and Santana lived together. This was the first time (JV1) and (JV2) met Alvarez  
 11 and Keke Caldwell, Alvarez' ex-boyfriend. Through conversations between Santana and Caldwell it was  
 12 understood that (JV2) would work for Santana and (JV1) would work for Caldwell. According to (JV2),  
 13 Santana did not want to prostitute (JV1) because she looked too young for him.

14                   On January 14, 2012, Alvarez, Santana, Caldwell, (JV1) and (JV2) traveled by vehicle, driven by  
 15 Alvarez to an auto repair business. Once, there Alvarez negotiated a sex act between (JV1), (JV2) and  
 16 Rudolfo Basulto. Basulto fondled the girl's nude breasts and massaged their bodies. Once complete,  
 17 money was exchanged and shared between Alvarez, Santana, and Caldwell. The group then traveled to  
 18 El Cajon Boulevard where Caldwell, Santana, and Alvarez instructed the girls on how to walk the street  
 19 soliciting sex for money. They provided telephone numbers to (JV1) and (JV2) to call once they had  
 20 received money from sex transactions.

21                   On February 16, 2012, (JV2) was detained by San Diego Police Department on suspicion of theft  
 22 at a Rite Aid. The loss prevention officer and Store Manager observed (JV2) give Claudia Alvarez a  
 23 large bundle of money. (JV2) advised the loss prevention officer that she was prostituting. (JV2) was  
 24 arrested on an outstanding warrant.

25                   During an interview subsequent to her arrest, (JV2) advised that Santana was her pimp. Santana  
 26 along with Alvarez worked together to photograph and post ads on www.Backpage.com (backpage)  
 27 under the alias "Jade" soliciting individuals for sex. A search was conduct on backpage against the  
 28 screen name "Jade". Three posts were located, two containing photos of (JV2) and one without photos.  
 (JV2) confirmed that all three postings were hers. The ads were posted between January 23, 2012 and  
 February 11, 2012.

29                   Backpage was served with subpoenas for the three postings identified by (JV2). The results  
 30 indicated that the posters telephone number was 619-xxx-3115 and the email address belonging to  
 31 Alvarez. This account on at least one occasion listed the owner of the account as Claudia Alvarez.  
 32 Telephone number, 619-xxx-4539, was listed in the administrative section of the return. On November  
 33 27, 2011, Caldwell was field interviewed by a San Diego Police Officer. He advised the officer his  
 34 telephone number was 619-xxx-4539.

35                   During her stay with Santana and Alvarez, (JV2) was directed on numerous occasions to provide  
 36 sex for money. Santana and Alvarez arranged for both, out-calls at businesses, hotels, and other venues,

1 and at least one in-call that occurred at Santana and Alvarez's apartment. Both Alvarez and Santana  
 2 received money from the in-call and out-call transactions.

3 A subpoena was served to Google Inc. for Alvarez's email address. Subpoena results listed  
 4 "Stephanie baby" as the account holder's name. Additional account was listed under "Claudia Williams".  
 5 Claudia Alvarez's middle name is Stephanie.

6 A subpoena was served on Cricket wireless for cellular telephone number 619-xxx-3115.  
 7 Subpoena results listed Maria Gomez, 720 Kedzie Avenue, San Diego, California 92154 as the  
 8 subscriber address. The account was activated on January 18, 2012. A record search for Jamie Santana  
 9 revealed 720 Kedzie Avenue as a place of residence. Cricket wireless billing information listed Courtney  
 10 Porter, 3665 Grove Street Unit 175, Lemon Grove, California 91945, as providing payment for the  
 11 service on two occasions. (JV2) advised that Courtney Porter was Santana's ex-girlfriend and that Maria  
 12 Gomez is the name of a girl she met while in Juvenile Hall. Records checks confirmed Courtney Porter  
 13 and the address given.

14 Alvarez was subsequently contacted and interviewed. Alvarez advised that she was aware (JV2)  
 15 was prostituting while living at her residence. She also claimed to be given \$200.00 by (JV2) which was  
 16 for Rent. She advised that her email address was the one listed above on the backpage ads. She stated  
 17 Santana was JV2's pimp.

18 On June 26, 2012, (JV2) was reported by her mother as missing from home. On July 2, 2012,  
 19 (JV2) was contacted by law enforcement pursuant to an outstanding warrant. In the subsequent  
 20 interview, she advised that she had contacted Santana via telephone. During that conversation, Santana  
 21 advised her that if she did not return to San Ysidro and work for him he was going to "shoot up" her  
 22 residence. (JV2) believed that Santana was going to kill her. (JV2) has seen Santana with firearms in the  
 23 past and he has told her he keeps a firearm at his mother's residence. (JV2) was scared that Santana was  
 24 going to harm someone in her family and believed her only option was to do as Santana directed.

25 Once in San Ysidro, she went to a Motel 6 were Santana was staying. She stayed in Motel 6  
 26 with Santana, his girlfriend Laresha Wilson, and other members of her family. The motel room was in  
 27 Wilson's name. According to the motel staff it was Santana who paid the bill in cash. While at the  
 28 motel, Santana and Wilson arranged multiple in-call "dates" for (JV2) which were advertised on  
 backpage under the alias "Amber". (JV2) advised that it was Santana that would control the money  
 which was used to purchase narcotics, clothing, food and pay for the motel.

29 A search was conduct on backpage against the screen name "Amber". Two posts were located  
 30 that contained photos of (JV2). (JV2) confirmed that the two postings were hers. The contact number on  
 31 one of the posts was 619-xxx-3692.

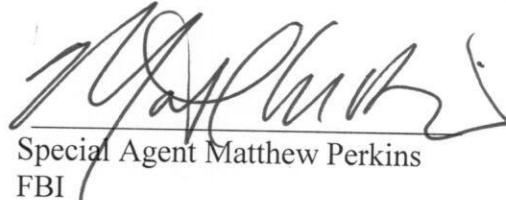
32 On July 2, 2012, Santana was arrested on state charges at Knights Inn, 230 Via De San Ysidro,  
 33 San Ysidro, California. During the interview of Santana, he advised that another person made him  
 34 recruit girls for prostitution. Santana stated it was his job to recruit girls and "sell them a dream". His  
 35 other duties included keeping watch over the girls in his charge. Santana advised that he did not collect  
 36 money from (JV2) however in exchange for keeping watch he was compensated by the other person  
 37 through, spending money, drugs, food, and shelter. Santana first learned that (JV2) was a minor after her  
 38 first arrest. Santana advised that during the months that (JV2) was prostituting, the cellular telephone  
 39 number he used was 619-xxx-3115.

40 During a consent search of the motel room, paperwork belonging to (JV2) was located. Also  
 41 located in the room were several notebooks. In these notebooks the scripts used in the backpage posts for  
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1 (JV2) and Wilson were written out. Also in the notebooks was account information for various accounts  
2 including backpage and pay and owe sheets for "johns" Wilson admitted to being a prostitute but said  
3 she was not working for Santana. Wilson advised that while at Motel 6, she posted an ad on backpage of  
4 herself. The telephone number on the post was 619-xxx-3692. That is the same contact telephone  
5 number on one of the (JV2) "Amber" posts.

6 **REQUEST FOR SEALING**

7 It is further respectfully requested that this Court issue an Order sealing, until further order of  
8 this Court, all papers submitted in support of this complaint, including the probable cause  
9 statement and arrest warrant. Sealing is necessary because premature disclosure of the contents  
10 of this probable cause statement and related documents may cause the defendant to flee and  
11 may cause the destruction of evidence and may have a negative impact on this continuing  
12 investigation.

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14 Special Agent Matthew Perkins  
15 FBI

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